IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Thomas D. Sanitate : :

Debtor : Chapter 13

:

Thomas D. Sanitate : Bankruptcy No. 19-13079 MDC

Movant

:

Loandepot.Com, LLC

v.

Respondent

:

:

RESPONSE OF LOANDEPOT.COM, LLC TO MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY

Respondent, Loandepot.Com, LLC, by and through its attorneys, Phelan Hallinan Diamond & Jones, LLP, hereby responds to MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY and in support thereof, avers as follows:

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Admitted.
- 7. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.
- 8. Debtor is due for the February 2020 through May 2020 payments in the amount of \$1,459.25 for a total amount due of \$5,836.80.

9. Denied. Responding party is without information needed to respond to this averment.

WHEREFORE, Respondent, Loandepot.Com, LLC respectfully requests that this Honorable Court deny MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY in its entirety.

Respectfully submitted,

Date: May 19, 2020 /s/ Jerome Blank, Esquire

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